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October 19, 2023

By ECF

Hon. Philip M. Halpern, U.S.D.J.
United States District Court
Southern District of New York
Hon. Charles L. Briant Jr. Federal Building and Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *Wolf, et al. v. Dolgen of New York, LLC*
Case No. 7:23-cv-0558-PMH
Proposed Confidentiality Order

Dear Judge Halpern:

This firm represents Defendant Dolgen of New York, LLC (“Dollar General”) in the above-referenced matter and we write in response to the Court’s Order, dated October 18, 2023 (ECF No. 39). Enclosed for Your Honor’s review and consideration is a copy of the Court’s Model Confidentiality Agreement and Protective Order, which contains a proposed addition to Paragraph 16 in track change form (Exhibit A). In accordance with your Individual Practice 1.I, Dollar General submits this requested revision to clarify the obligations of persons receiving Confidential material, ensuring that certain industry standards are followed when transmitting material designated Confidential.

If the proposed revision to the Confidentiality Order meets with Your Honor’s approval, the parties respectfully request that a clean copy of the fully executed revised Confidentiality Order (Exhibit B) be So Ordered and entered with the Clerk of the Court.

Thank you for your time and consideration of this matter.

Respectfully Submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

PAG:

Enclosures

cc: All Counsel of Record (by ECF)